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Counsel to the Plan Administrator for the Debtors

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11
: :
Gawker Media LLC, *et al.*,¹ : Case No. 16-11700 (SMB)
: :
Debtors. : (Jointly Administered)
: :
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NOTICE OF FILING OF PLAN ADMINISTRATOR AGREEMENT

PLEASE TAKE NOTICE that, on November 8, 2016, Gawker Media LLC (“Gawker Media”), Gawker Media Group, Inc. (“GMGI”), and Gawker Hungary, Kft. “v.a.”, f/k/a Kinja, Kft. (“Gawker Hungary”), the debtors and debtors in possession (collectively, the “Debtors”) in the above-captioned chapter 11 cases (the “Chapter 11 Cases”) filed the *Notice of Filing of Solicitation Version of the Disclosure Statement for the Debtors' Amended Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft.* [Docket No. 427] (the “Solicitation Version of the Amended Disclosure Statement”), which included as Exhibit A thereto the *Amended Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft.* (the “Plan”).

¹ The last four digits of the taxpayer identification numbers of the Debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary, Kft. “v.a.” (5056). The offices of the Debtors are located at 44 Lynden Street, Rye, New York 10580.

PLEASE TAKE FURTHER NOTICE that, on November 30, 2016, the Debtors filed the *Notice of Filing of Plan Supplement to the Debtors' Amended Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc. Gawker Media LLC, and Gawker Hungary Kft.* [Docket No. 516] (the "Plan Supplement"), which included as Exhibit A thereto a Form of Plan Administrator Agreement (the "Plan Administrator Agreement").

PLEASE TAKE FURTHER NOTICE that, on December 22, 2016, the Court entered an order confirming the Plan [Docket No. 638], which, among other things, approved the Debtors' entry into the Plan Administrator Agreement.

PLEASE TAKE FURTHER NOTICE that, on March 17, 2017, the Debtors and Opportune LLP (including its affiliates, "Opportune") executed the Plan Administrator Agreement (the "2017 Plan Administrator Agreement"), which (i) specified the services (the "Services") to be provided by Opportune for the Debtors, and (ii) provided that Opportune would make William D. Holden available to serve as the plan administrator for the Debtors (the "Plan Administrator").

PLEASE TAKE FURTHER NOTICE that, Mr. Holden, who has served as the Plan Administrator for the Debtors since the effectiveness of the Plan, is now a member of The Boathouse Group, LLC ("Boathouse") and separated from Opportune.

PLEASE TAKE FURTHER NOTICE that, on May 17, 2018, the Plan Administrator and Opportune executed the Termination of Plan Administrator Agreement, effective as of May 1, 2018, which provides, among other things, that the 2017 Plan Administrator Agreement is of no further force and effect (the "Termination Agreement").

PLEASE TAKE FURTHER NOTICE that, on May 17, 2018, the Debtors and Boathouse executed the Plan Administrator Agreement (the "2018 Plan Administrator").

Agreement”) which provides, among other things, (i) that Boathouse will perform the Services for the Debtors previously provided by Opportune, (ii) Mr. Holden will continue to serve as Plan Administrator for the Debtors, and (iii) terms for additional Services to be performed in connection with the sale of the Debtors’ remaining assets.

PLEASE TAKE FURTHER NOTICE that, prior to execution, the 2018 Plan Administrator Agreement was shared with Mr. Terry Gene Bollea and holders of a majority of the Gawker Media Contingent Equity Proceeds (as defined in the Plan), and none of them indicated that they had any objection to the 2018 Plan Administrator Agreement.

PLEASE TAKE FURTHER NOTICE that, the Plan Administrator hereby submits as **Exhibit A** hereto a true and correct copy of the 2017 Plan Administrator Agreement.

PLEASE TAKE FURTHER NOTICE that, the Plan Administrator hereby submits as **Exhibit B** hereto a true and correct copy of the 2018 Plan Administrator Agreement.

PLEASE TAKE FURTHER NOTICE that, the Plan Administrator hereby submits as **Exhibit C** a redline comparison of the 2017 Plan Administrator Agreement and the 2018 Plan Administrator Agreement.

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PLEASE TAKE FURTHER NOTICE that, the Plan Administrator hereby submits as
Exhibit D the Termination Agreement.

Dated: May 18, 2018
New York, New York

/s/ Gregg M. Galardi
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